

From: Sheldrake, Beth
Sent: Monday, May 12, 2014 10:07 AM
To: Rochlin, Kevin
Subject: FW: Independent Study Review rev 4 final
Attachments: Independent Study Review rev 4 final.docx

Follow Up Flag: Follow up
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From: Kelly Wright [<mailto:kwright@sbtribes.com>]
Sent: Wednesday, December 04, 2013 2:52 PM
To: Solis, Ricardo; Sheldrake, Beth
Cc: Virginia Monsisco
Subject: Independent Study Review rev 4 final

Ricardo, please find attached a copy of the final revised Independent Study Work Plan. This revision was done to document the change in employment. We originally were planning on hiring David Reisman as an Independent Contractor but this could not be accomplished due to the fact that he is an ex-employee of the EPA.

I had to reduce the number of hours allotted to our contractor to offset the additional costs associated with the fringe and indirect.

Here is the revised work plan.
Let me know if you need any additional information for this change.
Thanks
Kelly

Independent Study Review

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EPA is preparing to issue an Interim Record of Decision Amendment for the FMC Operable Unit in the coming months. The Tribes are in disagreement with EPA's Feasibility Study Assessment, specifically detailing in written comments and verbal comments for many years the need for EPA to require FMC to either treat the elemental phosphorus material or remove it from Tribal ground. The Tribal Cleanup Standards require treatment and/or removal of ignitable or reactive material from the Reservation. The EPA is continuing to evaluate the Tribal Cleanup Standards as ARARs. However, because the EPA is selecting an interim remedial action, a final determination of ARARs has not been made at this time.

The EPA has agreed to conduct an Independent Study to review excavation and/ or treatment options for elemental phosphorus. This Independent Study will require a Statement of Work for the entity conducting the review and ensure compliance with the terms of the Statement of Work. The Tribes will review and provide input on any reports or other documents produced by the review entity. The first phase of this review will involve profiling possible excavation and treatment technologies and will result in a report summarizing the review entities' findings. Depending on the results of the first phase, there may be a second phase which could include preliminary design analysis outlining major design features and information needs, including identification of additional studies or evaluations, such as a treatability study, related to implementability, effectiveness, costs, health and safety, or other concerns. This workplan addresses the Tribes needs for the first phase and will be amended at a later date if a second phase is implemented.

Staff and contract employees will work on all tasks within the Independent Study review of FMC OU including review documents, communicate issues with public and policy makers, schedule meetings, attend meetings and other tasks in compliance with this workplan. Travel with prior approval may be made to sites that may have implemented pilot projects or waste treatment facilities with issues that could assist at the EMF site.

Task 1 – Scoping Task:

Developing scope of work document for the independent review work to include but not limited to:

- 3 calls with EPA (1 for workplan/budget, 2 to discuss scope document),
- 2 internal calls with expert to discuss scope document,
- 2 internal calls without expert (to discuss strategy, legal issues, etc.), and
- Preparation for calls (reviewing documents, identifying issues, etc.),

Task 2 – Product Review:

Reviewing draft Argonne report, making comments, and reviewing final product. Specific tasks include but not limited to:

- Reviewing draft report,
- 2 internal calls with expert to discuss draft report,
- Reviewing and revising SBT comments on draft report, and
- Reviewing final report.

Task 3 – Next Steps:

Discussions with EPA on next steps/Phase 2 which involves the following:

- Presentation of final report to FHBC and LUPC for discussion of next steps,
- Preparation and meeting, and
- 1 call with EPA and preparation for call.

Task 4: Project Management:

Quarterly reporting (1/31, 4/30, 7/31, 10/31.).

Budget and resource management planning and coordination

SBT Personnel Estimated Hours – East Michaud Flats – Independent Study Review		Temp Employee
Task 1: Scoping Task	80	92
Task 2: Product review	80	44
Task 3: Next steps	40	12
Task 4: Project Management	40	0
Total	240	150

Commented [KW1]: EPA believes this is too high.

SBT Estimated Costs – Eastern Michaud Flats – Independent Study	
Personnel	\$ 33,543.00
Fringe Benefits	\$ 6,431.18
Contractual	\$ 27,149.18
Indirect Charges	\$ 10,792.94
Travel & Training	\$ 1,440.00
Total	\$79,191.00

Additional Detailed Cost:

Task #1	Developing scope of work	Hours Contractor #1	Hours Legal
	* = 3 calls with EPA (1 for work plan and 2 for scoping)	3	3
	* = 2 internal calls with Expert	3	3
	* = 2 internal calls without Expert	2	2
	* = Prep Time (reviewing and identifying issues)	20	4
Task #2	Reviewing Argonne Reports (Draft and Final)		
	* = Review Draft report	35.7	16
	* = 2 Internal Calls with Expert to discuss Report	5	5
	* = Reviewing and Revising Tribal Comments	5	5
	* = Reviewing Final Report	28	6
Task #3	Next Steps/Phase 2?		
	* = Presentation to FHBC and LUPC - Final Report & Next Steps	10	4
	* = Preparation	20	6
	* = Travel		8
	* = EPA Call	2	2
	* = Prep for call	2	1
Task #4	Project Management		
	* = Quarterly Reporting (4/30, 7/31 and 10/31)	0	0
	* = Budgeting, Managing and Coordinating Efforts	0	0
	Total Hours (Calculated by Spreadsheet)	135.7	65
	Hourly Rate	\$87.50	\$ 235.00
	Total Cost (Calculated by Spreadsheet)	\$11,874.18	\$ 15,275.00
	Contractor Total	\$ 27,149.18	

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